

AUG 05 2015

JAMES N. HATTEN, Clerk  
By: *pam* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

*v.*

KEVIN M. SULLIVAN

Criminal Indictment

No. **1:15-CR-290**

THE GRAND JURY CHARGES THAT:

**Count One**

On or about December 3, 2012, in the Northern District of Georgia, the defendant, KEVIN M. SULLIVAN, did knowingly receive at least one visual depiction of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), said depictions having been (a) produced using minors engaging in sexually explicit conduct, and (b) shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**Count Two**

On or about June 15, 2015, in the Northern District of Georgia, the defendant, KEVIN M. SULLIVAN, did knowingly possess at least one computer and computer storage device which contained at least one visual depiction of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), said depiction (a) having been produced using a minor engaging

in sexually explicit conduct, (b) involving at least one prepubescent minor and at least one minor who had not attained 12 years of age, and (c) having been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

A TRUE BILL  
T. Sullivan  
FOREPERSON

JOHN A. HORN

*United States Attorney*

*202 Jones*

PAUL R. JONES

*Assistant United States Attorney*

Georgia Bar No. 402617

*Erin E. Sanders*

ERIN SANDERS

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